

Message

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**From:** aileen.hooks@bakerbotts.com [aileen.hooks@bakerbotts.com]  
**Sent:** 4/10/2019 4:42:12 PM  
**To:** Quinones, Edwin [quinones.edwin@epa.gov]  
**CC:** molly.cagle@bakerbotts.com; Scott.Janoe@BakerBotts.com; matthew.kuryla@bakerbotts.com; MGaudet@item.com  
**Subject:** RE: ITC - Latest SOW  
**Attachments:** ITC CERCLA Statement of Work MP-RC-TM comments 4-7-19 BB 040919.pdf

Here's the pdf in case you need it.

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**From:** Hooks, Aileen  
**Sent:** Wednesday, April 10, 2019 11:34 AM  
**To:** Quinones, Edwin <quinones.edwin@epa.gov>  
**Cc:** Cagle, Molly <molly.cagle@bakerbotts.com>; Janoe, Scott <Scott.Janoe@BakerBotts.com>; Kuryla, Matthew <matthew.kuryla@bakerbotts.com>; MGaudet@item.com  
**Subject:** RE: ITC - Latest SOW

Ed,

There is also a tweak to paragraph 7. I am re-sending. Let me know if the changes still aren't coming through on your end. I believe we can prepare a pdf version to send if needed.

Best regards,

Aileen

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**From:** Quinones, Edwin <quinones.edwin@epa.gov>  
**Sent:** Wednesday, April 10, 2019 11:20 AM  
**To:** Hooks, Aileen <aileen.hooks@bakerbotts.com>  
**Cc:** Cagle, Molly <molly.cagle@bakerbotts.com>; Janoe, Scott <Scott.Janoe@BakerBotts.com>; Kuryla, Matthew <matthew.kuryla@bakerbotts.com>; MGaudet@item.com  
**Subject:** RE: ITC - Latest SOW

Thanks, Aileen. For some reason, the redline didn't show up at my end. I tried to do a comparison, though, and it looks like the proposed change is limited to Item 6 with language referencing compliance with state ARARs as opposed to state permit requirements. Just to be sure, could you try resending with redline text?

Edwin Quinones  
Assistant Regional Counsel  
US EPA Region 6, 6RC-S  
1445 Ross Ave.  
Dallas, TX 75202  
(214) 665-8035

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**From:** aileen.hooks@bakerbotts.com <aileen.hooks@bakerbotts.com>  
**Sent:** Tuesday, April 09, 2019 9:21 PM  
**To:** Quinones, Edwin <quinones.edwin@epa.gov>  
**Cc:** molly.cagle@bakerbotts.com; Scott.Janoe@BakerBotts.com; matthew.kuryla@bakerbotts.com; MGaudet@item.com  
**Subject:** RE: ITC - Latest SOW

Ed,

Attached are a few suggested changes to the draft SOW you sent yesterday (I accepted the changes in the draft you sent so this shows only the changes I've made.)

Also, as requested, below is suggested alternative language for identification of hazardous substances for jurisdictional purposes for use in paragraph 10 of the draft AOC instead of the current sentence referring to sample analyses:

"The discharge included xylene, which is a hazardous substance, and refined petroleum products."

Please let me know if you would like to discuss either the SOW or the AOC language proposal.

These draft AOC and SOW remain subject to further review and comment by our client.

Best regards,

Aileen

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**From:** Quinones, Edwin <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)>

**Sent:** Monday, April 8, 2019 12:07 PM

**To:** Hooks, Aileen <[aileen.hooks@bakerbotts.com](mailto:aileen.hooks@bakerbotts.com)>; Cagle, Molly <[molly.cagle@bakerbotts.com](mailto:molly.cagle@bakerbotts.com)>; Janoe, Scott <[Scott.Janoe@BakerBotts.com](mailto:Scott.Janoe@BakerBotts.com)>; Kuryla, Matthew <[matthew.kuryla@bakerbotts.com](mailto:matthew.kuryla@bakerbotts.com)>; MGaudet@item.com

**Subject:** ITC - Latest SOW

Hi Aileen,

Based on our discussion, I'm sending you the latest draft SOW. Changes made from the one I sent on Saturday include language added (and deleted) in Items 6 and 7. Although I've shared this with EPA management, they have not yet approved it. I also haven't shared it yet with TCEQ counsel, but I'll send them a copy shortly.

Thanks,

Edwin Quinones  
Assistant Regional Counsel  
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(214) 665-8035

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